

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

Cooley, Incorporated
Plaintiff

v.

C.A. No: 1:17-cv-00084 -M-LDA

Carlisle SynTec, Inc.; Ronald Mark
Associates, Inc.; RMA Technologies, Inc.;
Flex Membrane International Corp.; Leslie J.
Satz, in his capacity as Chairman and President of
Ronald Mark Associates, Inc.; Michael Satz,
in his capacity as General Manager of
RMA Technologies, Inc.; John/Jane Does 1-3;
Doe Corporations 1-3.
Defendants

JOINT MOTION TO ENLARGE SCHEDULING ORDER DEADLINES

The parties in the above-captioned matter and pursuant to F.R.C.P. 16(b)(4) and L.R. Cv 26(b) hereby move this Honorable Court for an Order enlarging the deadlines set forth this Court's Scheduling Order dated August 3, 2017. (Doc.38) As grounds for the instant motion, the parties state that significant discovery remains outstanding and the parties are continuing to pursue outstanding discovery diligently.

Accordingly, the parties believe that good cause exists to extend this scheduling Order as follows:

- (1) Fact Discovery shall be completed by September 10, 2018;
- (2) All Discovery must be served by August 10, 2018;
- (3) Plaintiff's expert disclosure shall be provided on or before October 10, 2018;
- (4) Defendants shall provide their expert disclosures on or before November 13, 2018.

The parties have discussed proposed deadlines for completion of expert depositions and deadlines for dispositive motions, however, as reflected in the discovery plan submitted to this

Honorable Court on January 30, 2018 (Doc. 117), the parties have not reached any agreement at this point.

WHEREFORE, good cause exists to enlarge the deadlines set in the initial Pre-Trial Scheduling Order. Accordingly, the parties respectfully request the within motion be granted.

Cooley, Incorporated
By its Attorneys

Ronald Mark Associates, Inc., RMA
Technologies, Inc. and Flex Membrane
International Corp.
by their Attorneys

/s/ Per C. Vaage, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2018, a copy of the foregoing document was filed through the Court's CM/ECF system. Notice of this filing will be sent electronically to the following registered participants as identified on the Notice of Electronic Filing (NEF):

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/s/ Per C. Vaage